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July 7, 2025

VIA ELECTRONIC FILING

Re: *Sabic-El-Rayess v. Tchrs. Coll., Columbia Univ.*, No. 1:24-cv-02891-JMF (S.D.N.Y.)

Dear Judge Furman:

Plaintiff Dr. Amra Sabic-El-Rayess hereby moves to file Exhibits D, G, and H to her Fourth Letter Motion to Compel Discovery under seal.¹ Plaintiff also moves to redact one parenthetical description of specific content in Exhibit D to her Fourth Letter Motion to Compel Discovery. Exhibits D, G, and H contain documents that Defendant Teachers College, Columbia University marked as “confidential” in discovery. Defense Counsel has requested that any filing of these documents be done under seal and any reference to any specific content in these documents be redacted. Pursuant to this Court’s Individual Rule #7(C)(i), Plaintiff’s Counsel notified Defense Counsel that Defendant must file, within three business days, a letter explaining the need to seal these Exhibits and redact the reference to specific content in Exhibit D.

The motion to seal is granted temporarily. The Court will assess whether to keep the materials at issue sealed or redacted when deciding the underlying motion. The Clerk of Court is directed to terminate ECF No. 89.

Respectfully submitted,

/s/ Alok Nadig

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SO ORDERED.

A handwritten signature in black ink, appearing to read "Alok Nadig".

July 8, 2025

Attorneys for Plaintiff Dr. Amra Sabic-El-Rayess

¹ Immediately after filing this Motion to File Under Seal and Redact, Plaintiff will (1) file under seal an unredacted and fully visible version of her Fourth Letter Motion to Compel Discovery and accompanying Exhibits, and (2) publicly file a partially redacted and not-fully-visible version of her Fourth Letter Motion to Compel Discovery and accompanying Exhibits.